

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Rules and Regulations Implementing)	CG Docket No. 02-386
Minimum Customer Account Record)	
Exchange Obligations on All Local and)	
Interexchange Carriers)	

To: The Commission

COMMENTS OF INTRADO INC.

Intrado Inc. (“Intrado”)¹ respectfully submits these comments in response to the notice of proposed rule making (“NPRM”) issued by the Federal Communications Commission (“Commission”) in the above-captioned docket.² Intrado has had extensive involvement in the Order and Billing Forum (“OBF”) of the Alliance for Telecommunications Industry Solutions (“ATIS”) and is therefore familiar with the issues that originally gave rise to this NPRM.³

Discussion

The Commission has done a good job of ensuring that as a consumer chooses a local exchange carrier or moves from one local exchange carrier to another, the network information required to deliver service is made available to the carriers that need it. At issue in this NPRM is the need to ensure that the necessary billing information is available to such carriers.

¹ Intrado (NasdaqNM: TRDO) provides the core of the nation’s 9-1-1 infrastructure and delivers innovative solutions to communications service providers and public safety organizations, including complex data management, network transactions, wireless data services and notification services.

² *Rules and Regulations Implementing Minimum Customer Account Record Exchange Obligations on All Local and Interexchange Carriers*, Notice of Proposed Rulemaking, CG Docket No. 02-386, FCC 04-50 (rel. March 25, 2004).

³ In addition, Intrado’s National Repository Line Level Database solution was recommended by OBF as a potential solution to many of the issues posed in the original petitions as well as those posed in this NPRM.

Seven years ago the OBF task force conservatively estimated that the industry impact from the issues raised in the NPRM equated to approximately \$1 billion per year.⁴ Based on this well understood need, dozens of companies participating in the industry dedicated resources to further define the problem and describe a solution. The concept of the national repository line level database was established in an industry request for proposal published by OBF.

In addition to the loss of revenue, the inability to identify local carrier lines inhibits LEC-to-LEC migration of customer accounts, inter-carrier and customer billing issues, and servicing of customers accounts, and it complicates fraud detection by misidentifying legitimate traffic. All of these resulting issues will further discourage carriers from providing services to lines which are too hard to identify. The number of companies offering alternative services will eventually decline, thereby reducing consumer choice.⁵

As for the wireless segment of the industry, issues exist with respect to the identification of wireline and wireless line ranges. This situation exists in a shared NPA/NXX range. As a result, providers are not able to accurately associate traffic to the appropriate carriers, nor can they accurately assign or validate the appropriate call types, which impacts rates, taxes, and service funds (e.g., Universal Service Fund). With the addition of other types of shared ranges brought on by competition, the scope and impact to all carriers has increased. These impacts have and will continue to expand as customers port their telephone numbers to carriers not associated with the applicable NPA-NXX range. The impact to the industry is only magnified if the old and new service types are different (e.g., wireline vs. wireless).

Not resolving this issue has two potential consequences, neither of which is in the best interest of creating a vibrant and competitive telecommunications industry in the United States. First, several existing telecommunications business models could be eliminated. Interexchange carriers that do not have a direct and ongoing billing relationship with the consumer must have access to billing information from the local exchange carrier or risk writing off revenue for services that are delivered but are unbillable. At best, the uncollectible revenue raises the rates for all customers that do get billed. At worst, the uncollectible revenue is so high that the carrier cannot make a profit and remain competitive in their pricing. Dial-around interexchange carriers

⁴ See Alliance for Telecommunications Industry Solutions, *Draft National Line Level Database Technical Specifications Reference Document*, at 3 (available at <http://www.atis.org/atis/private/obf/>).

⁵ This phenomenon is already occurring with carriers that provide a closed network, which effectively eliminates equal access. Carriers have taken this approach, in part, to limit their exposure to competition.

are most at risk, but other business models are as well. Second, industry growth could be stifled and future business models could be discouraged. New, creative, competitive, high-value services that, while technically feasible, cannot be billed for simply will not be offered to consumers. Requiring carriers to make billing information available to other service providers having a legitimate need for such information would help eliminate this hurdle to innovation.

Intrado believes there is merit in establishing minimum Customer Account Records Exchange (“CARE”) standards as proposed by the Joint Petitioners. However, Intrado believes that minimum standards will not themselves alleviate all of the billing and service issues facing service providers in a competitive communications market. Therefore, Intrado recommends that the Commission consider the merits of a national repository line level database that would be used to facilitate back office operations much as the Commission supports the Number Porting Administration Center (“NPAC”), which facilitates the network provisioning of ported telephone numbers in a competitive market. A national repository line level database is designed to provide the communications industry with information associated with a line, which facilitates processes including, but not limited to, end user billing, interconnection billing, jurisdiction determination, business relationship with a lines provider, business risk assessment of a line, fraud detection, and compliance with Communications Assistance for Law Enforcement Act of 1994.⁶

The creation of a national repository line level database can be accomplished in several ways. The NPAC model could be followed, whereby a single provider would be chosen to administer the database and provide services to all carriers having a legitimate need to access the information. Alternatively, a competitive model could be implemented. The Commission could establish a set of rules requiring the sharing of certain data elements, but the service could be delivered by companies in an open competitive environment. Whatever the structure, Intrado believes that the creation of a national repository line level database will provide the industry with a solution to the challenges discussed above.

Undertaking such an effort would not negatively impact the industry. There are multiple sources (i.e. existing billing and operation support systems) from which the required information can be obtained, and, in most cases, no additional programming would be required and no

⁶ Pub. L. No. 103-414, 108 Stat. 4279 (codified at 47 U.S.C. §§1001-1010 and scattered sections of 18 and 47 U.S.C.).

additional software would need to be purchased. Because these systems are already part of carriers' existing internal processes, no significant amount of additional staff time or human capital would be needed.

Finally, as services become intermingled (e.g., wireline, wireless, Voice Over Internet Protocol), it will become increasingly difficult for networks and back-office systems to identify the originating service provider or customer. The problems addressed in this proceeding, therefore, will continue to worsen over time if a national repository line level database is not implemented.

Conclusion

Intrado believes that the Commission needs to mandate minimum CARE requirements for all local exchange providers in order to eliminate any ambiguities that might exist today. The Commission should take the additional step of exploring the creation of a national repository line level database, either via the competitive or NPAC models. Without such a database, the problems affecting today's carriers will impact providers of new technologies such as VoIP.

Respectfully Submitted,

/s/ Mary Boyd

Mary Boyd
Vice President Government
and External Affairs
Intrado Inc.
1601 Dry Creek Drive
Longmont, Colorado 80503
Telephone: (720) 494-5800
Facsimile: (720) 494-6600

Dated: June 3, 2004